

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

IN THE MARION SUPERIOR COURT
CAUSE NO. 49D04-0612-PL-052207

STATE OF INDIANA,)
)
Plaintiff,)
)
v.)
)
ALLEN R. KLEIMAN,)
individually and doing business as)
NOVELTYWORKSDEGREES.COM)
)
Defendant.)

FILED
56 APR 25 2007
Elizabeth J. White
CLERK OF THE MARION CIRCUIT COURT

PLAINTIFF'S MOTION FOR RULE TO SHOW CAUSE

The Plaintiff, State of Indiana, by Attorney General Steve Carter and Deputy Attorney General Terry Tolliver, moves the Court to enter an Order requiring the Defendant, Allen R. Kleiman, to show cause why he should not be punished for contempt of court for his failure to comply with the Preliminary Injunction entered by the Marion Superior Court on December 28, 2006. In support of its Motion, the Plaintiff shows the following:

1. On December 28, 2006, the parties appeared for a hearing on the Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction before the Honorable Thomas J. Carroll.
2. At the conclusion of the hearing, the Court entered a Preliminary Injunction enjoining the Defendant, Allen R. Kleiman, his employees, agents, representatives, and any other person acting at his direction from soliciting or engaging in the sale of purported high school and college diplomas or transcripts, via the Internet or

otherwise, without obtaining prior authorization from the named high school or college, in violation of the Indiana Deceptive Consumer Sales Act, Indiana Code § 24-5-0.5-1, *et seq.*

3. On or about April 4, 2007, the State of Indiana learned the Defendant had resumed operating his website, <http://noveltyworksdegrees.com>, and continues to sell fake diploma and degree documents that are “complete with authentic stamps or embosser imprints (or both) with actual course names matching the general University Standard.” The Defendant further states, “The transcript curricula will be comprised of real course names from real university online resources. They are comprised of the standard pre-requisites, number of credit hours and a good GPA.” Finally, the Defendant includes a quote from an alleged customer stating, “They [the diploma and transcript] are amazing, it’s uncanny how authentic they look.” Attached and incorporated by reference as Exhibit “A” is a true and accurate copy of a webpage from the Defendant’s website offering fake diplomas and transcripts.

4. When ordering a degree, the Defendant requests customers submit a “Degree Information Form”, which allows the customer to select a University Name and a Degree Major. Attached and incorporated by reference as Exhibit “B” is a true and accurate copy of the Degree Information Form.

5. The Degree Information Form allows the customer to type the name of any university he or she chooses. The Form also lists a number of Degree Majors from which a customer may choose. Among these Degree Majors are “Criminal Justice”, “Biology”, “Pre-Med Biology”, “Education”, “Engineering”, and “Clinical Psychology.”

Attached and incorporated by reference as Exhibit “C” is a list of the degrees offered by the Defendant on his website.

6. The Defendant also offers to sell transcripts and lists a transcript from the University of Aberdeen as an example of a transcript one could presumably order from his website. The Defendant further states, “The word ‘void’ appears in this fake transcript because the document was scanned. Such text cannot otherwise be seen.” Attached and incorporated by reference as Exhibit “D” is a true and accurate copy of the product page listing transcripts for sale from the Defendant’s website.

7. According to its website, “the University of Aberdeen is Scotland’s third oldest and the fifth oldest in the UK. Aberdeen is an international university built on serving one of the most dynamic regions of Europe.” The University’s logo and font are also similar to those used by the Defendant in the transcript he created and displays on his website. Attached and incorporated by reference as Exhibit “E” is a true and accurate copy of the University of Aberdeen’s logo and font.

8. Upon information and belief, the Defendant has not received prior authorization from the University of Aberdeen.

9. The Defendant also offers to sell fake diplomas and lists a diploma from the University of Southern Florida as an example of a diploma one could presumably order from his website. Attached and incorporated by reference as Exhibit “F” is a true and accurate copy of the product page listing diplomas for sale from the Defendant’s website.

10. When conducting a search for the “University of Southern Florida”, one will find a link to the University of *South* Florida. According to its website, the University of South Florida is located in the thriving Tampa Bay area and is recognized as one of the nation’s top metropolitan research universities.

11. The university seal used on the University of Southern Florida diploma is similar to that used by the University of South Florida. Attached and incorporated by reference as Exhibit “G” is a true and accurate copy of a webpage from the University of South Florida’s website showing its university seal.

12. Upon information and belief, the Defendant has not received prior authorization from the University of South Florida to use its logo or to produce diplomas purported to be awarded by the University of South Florida.

13. On April 11, 2007, the Plaintiff, by Deputy Attorney General Terry Tolliver, telephoned the Defendant’s Counsel, Virginia Caudill, and requested the Defendant provide a copy of the diplomas he is now selling. Attached and incorporated by reference as Exhibit “H” is a true and accurate copy of the diploma sent to the Plaintiff by the Defendant’s Counsel.

14. The diploma sent by the Defendant’s Counsel purports to be from Northampton University. When conducting a search for “Northampton University”, one will find a link to the University of Northampton. On its website, the University of Northampton states it is a “dynamic, modern university situated in the heart of England.”

15. Upon information and belief, the Defendant has not received prior authorization from the University of Northampton to use what purports to be its logo or to produce diplomas that purport to be awarded by the University of Northampton.

16. Pursuant to Indiana Code § 24-5-0.5-3(a)(1), it is a deceptive act for the Defendant to misrepresent, either orally or in writing, the subject of a consumer transaction has sponsorship, approval, performance, characteristics, accessories, uses, or benefits it does not have which the supplier knows or should reasonably know it does not have.

17. Pursuant to Indiana Code § 24-5-0.5-3(a)(2), it is a deceptive act for the Defendant to misrepresent, either orally or in writing, the subject of a consumer transaction is of a particular standard, quality, grade, style, or model, if it is not and if the Defendant knows or should reasonably know it is not.

18. Pursuant to Indiana Code § 24-5-0.5-3(a)(7), it is a deceptive act for the Defendant to misrepresent, either orally or in writing, the Defendant has a sponsorship, approval, or affiliation in such consumer transaction he does not have, and which the Defendant knows or should reasonably know that he does not have.

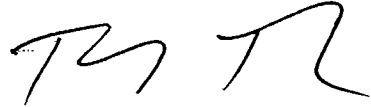
19. Based upon these continued violations of the law, the Plaintiff, State of Indiana, requested the Defendant comply with the Court's prior Preliminary Injunction and shut down his website. As of today, the Defendant has refused to do so and his failure to do violates not only the law, but the Court's Preliminary Injunction, as well. Furthermore, his refusal to comply with the Court's Preliminary Injunction and continued operation of the website constitutes bad faith.

WHEREFORE, the Plaintiff, State of Indiana, requests the Court order the Defendant, Allen R. Kleiman, to personally appear in Court and show cause why it should not be punished for contempt of Court, and for all other proper relief.

Respectfully submitted,

Steve Carter
Indiana Attorney General
Atty. No. 4150-64

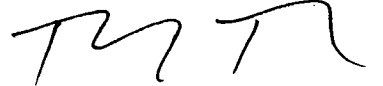
By:



Terry Tolliver
Deputy Attorney General
Atty. No. 22556-49

CERTIFICATE OF SERVICE

The undersigned hereby certifies copies of the above Motion were sent via facsimile, (317) 686-1150, and by United States Mail, first class postage prepaid, to the Defendant's Counsel, Virginia A. Caudill, Caudill & Associates, 156 East Market Street, Suite 200, Indianapolis, Indiana, 46204, this 25th day of April, 2007.



Terry Tolliver

Office of Attorney General
Indiana Government Center South
302 W. Washington Street, 5th Floor
Indianapolis, IN 46204
Telephone: (317) 233-3300

Search for:

Welcome Guest

[Login | Register]

[Homepage](#)

[Fake Diploma +
Transcripts](#)

[Kit
Version](#)

[Fake
Diploma](#)

[Download
Degree Maker](#)

[Fake High
School Diploma](#)

[Deluxe
College
Degree](#)

[Sale
Items](#)

Shopping Cart

Your basket is empty.

Items in cart:

Total:

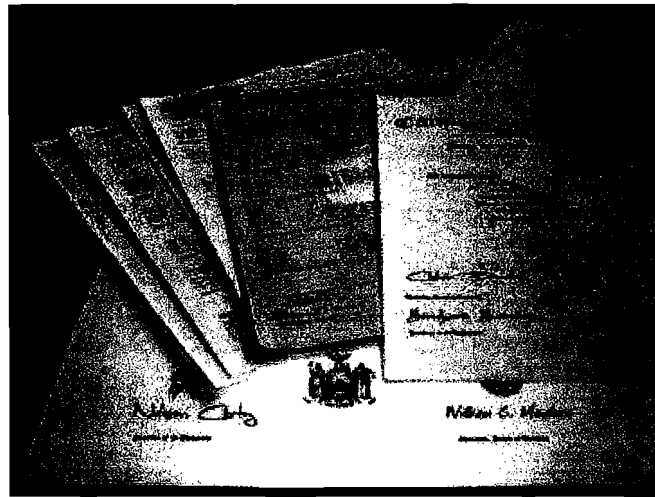
0

\$0.00

[View Basket](#)

Location: > Fake Diploma + Transcripts

Fake Diploma + Transcripts



Featured Product



Transcripts Only

Information

Products: 9

Categories: 7

Prices: US Dollars

Currency

US Dollars

Language

English

Popular Products

1. Fake Diploma + Transcripts
2. Fake Diploma
3. Deluxe fake diploma plus Transcripts

Sale Items

1. Transcripts Only
Save \$10.00

Mailing List

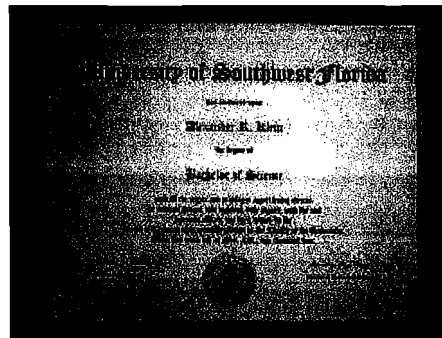
Subscribe to our mailing list below:

Email:



Product Information

Your fake college degree will be as realistic as possible. All Fake Diploma - degree documents are complete with authentic stamps or embosser imprints (or both) with actual course names matching the general University Standard. We always include transcripts with reverse information either containing an explanation of the grades or the transcript security features.



NEW!!! 18 KT. Gold Embossed Seals. This is 'Gold Leafing' over our proprietary Embossment on parchment. Type "GOLD" after your name on the Degree Information Form - no extra Charge!

Our standard diploma paper is used by universities,

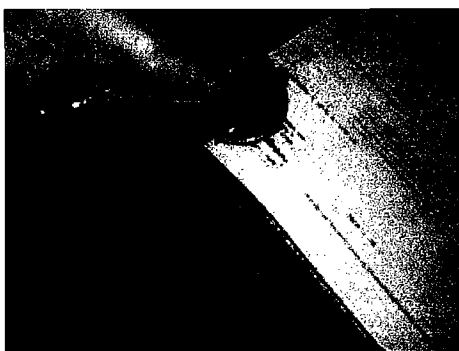


High Schools and Corporations (corporate awards of course). This particular paper is only bought through specialty suppliers--it's not faux parchment available at office supply stores and it's quite expensive. As for the seal, whether using a quality printed seal or our custom gold embossed seal, we'll use what appears most authentic for your fake diploma.

Dead Universities

"...I am stunned, excellent quality!" -customer

The transcript curricula will be comprised of real course names from real university online resources. They are comprised of the standard pre-requisites, numbers of credit hours and a good GPA. Fake Degree Information Form: [click here](#)



Note the quality of detail

Not Available to Indiana Residents

"They are amazing, it's uncanny how authentic they look." -customer

Want it quicker?

Price: \$99.95

■ Tell a Friend

Product Code: DIP31

Quantity: [Add to Basket](#)

[Contact Us](#) | [fake degree Majors](#) | [Faq&Mission](#) | [Product Policy](#) | [Testimonials](#)

NoveltyWorksDegrees.com Degree Information Form

After you submit, a thank you screen will display -this means we've also received your information.

This is not a Diploma Generator, only paid orders are processed

Please fill in all fields marked with a



Name to Appear on Degree:

*



University Name:

*



Number for Student ID:

*



Graduation Year:

*



Degree Major:

ACCOUNTING AA



*



Your e-mail address provided in sign-in:

*

[Submit Form](#)

[Reset Form](#)

POWERED BY

php

Form Generator



ACCOUNTING AA
BUSINESS MANAGEMENT AA
CRIMINAL JUSTICE AA
ACCOUNTING BA
BIOLOGY BS
BUSINESS ADMINISTRATION BA
BUSINESS ADMINISTRATION-MARKETING FOCUS BA
ADMINISTRATION-MARKETING FOCUS BA
BUSINESS MANAGEMENT BA
COMPUTER SCIENCE BS
COMMUNICATIONS BA
CRIMINAL JUSTICE BA
EDUCATION-GENERAL BA
EDUCATION-PHYSICAL EDUCATION BA EDUCATION BA
ENGLISH BA
ENGINEERING: CIVIL BS
ENGINEERING:COMPUTER BENGINEERING: ELECTRICAL BS
ENGINEERING: MECHANICAL BS
ECONOMICS BA
FINANCE BA
HIGH SCHOOL
HISTORY BA
HEALTH CARE MANAGEMENT BAINFORMATION TECHNOLOGY
BSINTERNATIONAL RELATIONS BA
LITERATURE BA
LABOR RELATIONS BA
MARKETING BA
PRE-MED BIOLOGY BS
PUBLIC ADMINISTRATION BA
PSYCHOLOGY BASPORTS MANAGEMENT BA
SOCIOLOGY BA
SOCIAL WORK BSW
BUSINESS ADMINISTRATION MBACOMMUNICATIONS MA
COMPUTER SCIENCE MS
ENGLISH LITERATURE MA
EDUCATION Med (MASTER
EDUCATION-SPECIAL ED Med
EDUCATION-SCHOOL COUNSELING Med
MARKETING MA
MIS-MASTER'S
PSYCHOLOGY-CLINICAL MA
PUBLIC ADMINISTRATION MA
BIOLOGY MS
BUSINESS PHD
DIVINITY-DOCTOR OF
EDUCATION EDD (DOCTOR)
PSYCHOLOGY-CLINICAL PHD



Search for:

Welcome Guest

[Login | Register]

Homepage

Fake Diploma +
Transcripts

Kit
Version

Fake
Diploma

Kit
Extras

Download
Degree Maker

Fake High
School
Diploma

Deluxe
College
Degree

Shopping Cart

Your basket is empty.

Items in cart:

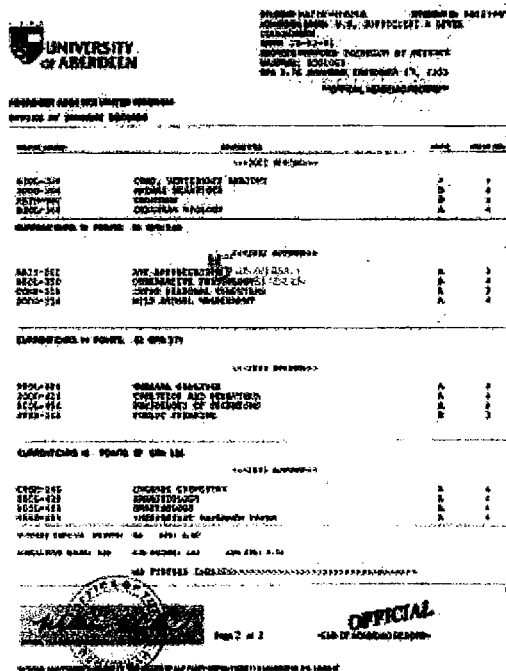
Total:

0
\$0.00

[View Basket](#)

Location: > Fake Diploma + Transcripts

Transcript Xtras



Featured Product



Download Degree maker

Information

Products: 8

Categories: 7

Prices: US Dollars

Currency

US Dollars

Language

English

Popular Products

1. Fake Diploma + Transcripts
2. Fake Diploma
3. Deluxe fake diploma plus Transcripts

Mailing List

Subscribe to our mailing list below:

Email:



Product Information

Two transcript Duplicates

If you are purchasing either our Fake Diploma + Transcripts or the Deluxe version, we offer transcript copies/duplicates for sale. These extra "copies" will be exact duplicates of those in your order, giving you three total sets with your completed order.

The word 'Void' appears in this fake transcript because the document was scanned. Such text can not otherwise be seen.

Price: \$19.95





text only

Welcome to the University of Aberdeen

[A-Z Index](#) | [Search](#) | [Email & Telephone](#) | [Maps & Travel](#) | [Contacts](#) | [Studying at Aberdeen](#) | [Prospectuses](#)



Search for:

Welcome Guest

[\[Login\]](#) | [\[Register\]](#)[Homepage](#)[Fake Diploma +
Transcripts](#)[Kit
Version](#)[Fake
Diploma](#)[Kit
Extras](#)[Download
Degree Maker](#)[Fake High
School Diploma](#)[Deluxe
College
Degree](#)**Shopping Cart**

Your basket is empty.

Items in cart:

Total:

0
\$0.00[View Basket](#)**Information****Products:** 8**Categories:** 7**Prices:** US Dollars**Currency**

US Dollars

Language

English

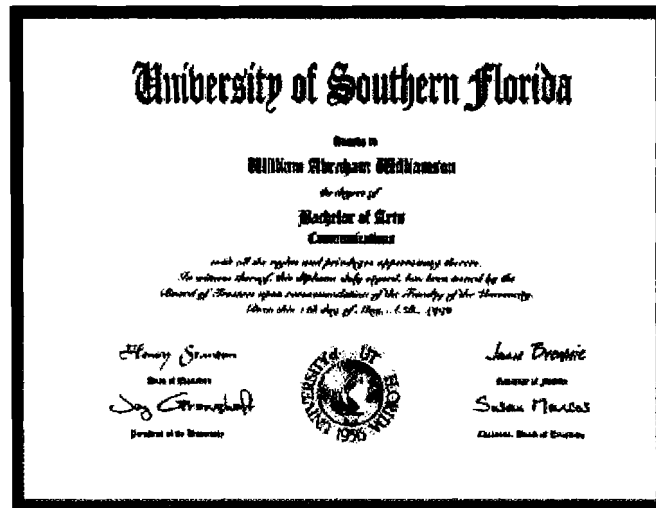
Fake Diploma**Products in:** > Fake Diploma

Image	Description	Price
	Fake High School Diploma Your fake high school diploma Plus Transcripts will look as professional as the real thing. We add the state seal...	\$69.95 Buy More
	Fake Diploma All diploma parchment is that used by actual universities (76# parchment), not faux retail car...	\$69.95 Buy More

Featured Product

Fake Diploma

Popular Products

1. Fake Diploma + Transcripts
2. Fake Diploma
3. Deluxe fake diploma plus Transcripts

Mailing List

Subscribe to our mailing list below:

Email:

[Contact Us](#) | [fake degree Majors](#) | [Faq&Mission](#) | [Product Policy](#) | [Testimonials](#)




- [Search USF](#)
- [USF Site Map](#)
- [USF Home](#)

[Prospective Students](#) | [Our Students](#) | [Visitors](#) | [Faculty & Staff](#) | [Alumni & Parents](#) | [Business & Community](#) | [Campuses](#)

[Home](#) > [About USF & Tampa Bay](#) > [History & Traditions](#) > [USF's Seal and Symbols](#)

— USF History —

USF's Seal and Symbols

- :: [History Site Index](#)
- :: [Historical Overview](#)
- :: [Timeline of Events](#)
- :: [Hall of Presidents](#)

- :: [USF Site & Name](#)
- :: [John Allen Legacy](#)
- :: [40 Years of Memories](#)
- :: [Named Buildings & Sites](#)
- :: [Medical School History](#)
- :: [Medicine's 1st 25 years](#)
- :: [Marshall Center History](#)
- :: [Early Women's Athletics](#)
- :: [Student Trends](#)
- :: [Snow at USF!](#)

- :: [1st Student](#)
- :: [1st Professor](#)
- :: [1st Basketball Team](#)
- :: [1st Football Team](#)
- :: [1st Marching Band](#)
- :: [1st Years of The Oracle](#)
- :: [1st Trustees](#)

- :: [USF Sarasota/Manatee](#)
- :: [USF St Petersburg](#)
- :: [USF Lakeland](#)

— USF Traditions —

- :: [Traditions Overview](#)
- :: [Alma Mater](#)
- :: [Academic Mace](#)
- :: [USF Seal & Symbols](#)

- :: [Rocky the Bull](#)
- :: [Herd of Thunder](#)

- :: [Homecoming](#)
- :: [Student Gov. Ceremony](#)
- :: [Bull Market](#)
- :: [Movies On The Lawn](#)
- :: ["Go Bulls" Hand Symbol](#)
- :: [Retired Athletic Jerseys](#)

:: The Seal :: [The Logo](#) :: [Rocky the Bull](#)



The Seal: In 1958, Dr. John Allen, the first president of the University of South Florida, commissioned Henry (Hank) Gardner to design and create the official seal for the University. At the time Gardner was vice president of the Industrial Supply Corporation. Gardner completed the project in six weeks.

Gardner said President Allen wanted a symbol that would depict education on a global level. University founders knew that humankind's next great frontier was outer space. But they also realized that the University would dwell in, and serve the pressing

needs of, inner space. Thus, the globalization of the University.

Each element of the seal has special meaning. The sun gives life to all living things. The lamp symbolizes learning. The globe represents the universal expansiveness of educational opportunity and challenge. President Allen's own cornerstone for the University was--and is -- Truth and Wisdom.

Mrs. Grace Allen, wife of the late founding president, said green and gold were selected school colors because they were "workable" and no other university in the State of Florida had adopted them as official colors.

The seal has been in usage from the first catalog in 1959 to today. For many years it was the most commonly used symbol on business cards and stationary. Since 1988 the seal has been reserved for use on diplomas, academic certificates and other legal documents.



UNIVERSITY OF
SOUTH FLORIDA

The New USF Logo: USF established a new visual identity in May 2003 with the launch of a fresh new logo and brand identity.

A study of business and community leaders showed that 82 percent believe USF has made significant progress toward becoming a world class university and internal and external groups said USF was ready to make a bold statement about what it aspires to be.

A team of USF graphics designers developed 20 different logo ideas, and more than 300 faculty, staff and students participated to offer input and feedback. After seeing designs in various uses- from advertisements to business cards to the web site and annual reports- 84 percent of participants said the new monogram design was a "clear winner."

The logo has a strong and sophisticated look and feel and portrays the university's aspirations toward becoming a nationally prominent Research I University. The new green and gold color scheme uses a slightly darker green and shifts from the yellow to a more golden hue. This classic design style is bold and crisp, and more versatile for a variety of needs and uses. David Fink, along with colleagues from USF's University Relations graphic design team, developed the logo design.

To download the USF logo, or to review usage guidelines, go [here](#).



The USF Logo: In the 1970s several other designs in conjunction with or instead of the seal appeared on catalogs but their usage was limited. By the early 1980's a thin, script-type "USF" was used for recruiting and information brochures.



USF alumnus Pat Hill was instrumental in the design of the 1984 USF outline logo designed for Athletics use and also in the design and writing of the USF Graphic Standards Manual in 1988. That manual put forth a similar logo which has been used University-wide since.

The "USF" logo was designed for general usage on USF correspondence and publications. Hill said the intent of the 1984 and 1988 designs of the "USF" acronym, in large type with "University of South Florida" spelled out below, was meant to lessen public confusion with Florida Southern College and the University of San Francisco. In recent years "USF" has been used along with the spelling out of the "University of South Florida" stacked in two lines above or alongside "USF."



Rocky the Bull: In 1965-66 Ray Cooper, then a student assistant in the graphics department, designed a Brahman Bull for the Bookstore to sell as a toy. But not until the early 1970's were Bull cartoon renditions drawn for athletics publicist John Renneker to use with newsletters.

A fighting bull figure standing on two legs was trademarked in 1974 and was in use for commercial purposes through the early 1980's when the teams were still known as the Golden Brahmans. In 1984, Athletics trademarked the horned head of a bull and the hump of the bull's back emerging from correspondence and marketing. The diamond shape apparently is a simply a design element to contain the bull-head. The teams have known as the Bulls since the mid-1980s. The bull-head was re-designed in the mid 1990's to reflect a more aggressive look.

University Relations, 4202 E. Fowler Avenue, ADM264, Tampa, FL 33620 -- (813) 974-4014

Direct questions or comments about the Web site to www@admin.usf.edu

Copyright © 2002-2003, University of South Florida



CAUDILL & ASSOCIATES
MICHAEL E. CAUDILL
ATTORNEY AT LAW

FACSIMILE TRANSMITTAL SHEET

TO:	<u>Terry Toliver</u>	FROM:	<u>Michael Caudill/ Kerry Wiles</u>
COMPANY:	<u>Attorney Generals Office</u>	DATE:	<u>4-11-07</u>
FAX NUMBER:	<u>233-4393</u>	TOTAL NO. OF PAGES INCLUDING COVER:	<u>5</u>
PHONE NUMBER:		SENDER'S TELEPHONE NUMBER:	<u>(317) 686-7788</u>
RE:	<u>49D04 - 0612-PL-052207 (317) 686-1150</u>		

☒ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY

NOTES/COMMENTS:

Per our conversation - we will
be out of the office after 5:15 -
will call you tomorrow!

The information contained in this facsimile message is confidential information intended only for the use of the recipient named above and may be the subject of attorney-client privilege. If the reader of this message is not the named recipient, or the employee or an agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify us by telephone. Thank you.

All questions concerning this facsimile transmission should be directed to:

Kerry Wiles at (317) 686-2340

156 E. MARKET STREET, SUITE 200
INDIANAPOLIS, IN 46204



Northampton University

has conferred upon

Linda M. Ralther


the degree of

Bachelor of Arts

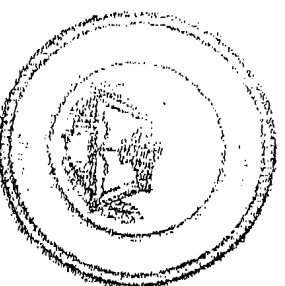
English

with all the rights and privileges appertaining thereto. In witness thereof, this diploma duly signed, with the state seal
hereto affixed, has been issued by the

Board of Trustees upon recommendation of the Faculty of the University.
Given this twelfth day of June, A. D. nineteen hundred and ninety-eight.



President of the College



Susan R. Goodwin

Chairman, Board of Trustees

NOVELTY ITEM
FOR ENTERTAINMENT
PURPOSES ONLY